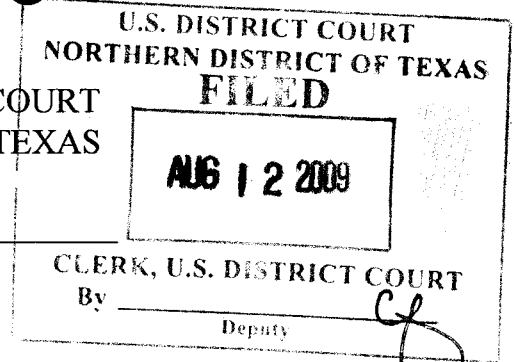


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
SAN ANGELO DIVISION



UNITED STATES OF AMERICA

v.

WILLIAM ADAIR(1)
LISA SMITH (2)
JAMIE KING (3)
CLINTON JOHNSON (4)

§
§
§
§
§
§

No. _____

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Make, Possess, and Utter Forged Securities
(Violation of 18 U.S.C. § 371)

From on or about a date unknown to the grand jury, and continuing through in or about April 2009, in the San Angelo Division of the Northern District of Texas, and elsewhere, **William Adair, Lisa Smith, Jamie King, and Clinton Johnson**, defendants, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with each other and with persons unknown to the grand jury to commit offenses against the United States, that is, to manufacture, possess, and utter counterfeit securities of an organization, with the intent to deceive another person and organization in violation of Title 18, United States Code, Section 513(a).

MANNER AND MEANS

It was part of this conspiracy that one or more of the conspirators would and did:

1. Make counterfeit securities of an organization;
2. Possess counterfeit securities of an organization; and
3. Utter counterfeit securities of an organization.

OVERT ACTS

In furtherance of this conspiracy and to effect the objects thereof, the conspirators committed, among others, the following overt acts in the Northern District of Texas and elsewhere:

1. Substantive counts two through thirty-eight of this indictment are hereby incorporated as overt acts of this conspiracy and of this count one.

All in violation of Title 18, United States Code, Section 371.

Counts Two through Twenty-One
Uttering Forged and Counterfeited Securities
(Violation of 18 U.S.C. § 513(a))

Beginning on or about the dates set forth below, in the San Angelo Division of the Northern District of Texas, and elsewhere, **William Adair, Lisa Smith, Jamie King, and Clinton Johnson**, defendants, did make, possess, and utter, forged and counterfeited securities of an organization, as that term is defined in Title 18, United States Code, Section 513(c)(4), with the intent to deceive another person and organization:

Count No.	Date of Offense	Name of Drawer	Name of Financial Institution	Amount of Check
2	3/23/09	A Landscape Solution	Crocket National Bank	\$912.00
3	3/23/09	A Landscape Solution	Crocket National Bank	\$1,219.51
4	4/01/09	Abbott's Supermarket	San Angelo National Bank	\$395.32
5	4/01/09	Abbott's Supermarket	San Angelo National Bank	\$835.76
6	4/01/09	Abbott's Supermarket	San Angelo National Bank	\$300.00
7	3/31/09	C & H Transmission	Wells Fargo	\$621.89
8	3/31/09	C & H Transmission	Wells Fargo	\$621.89
9	3/31/09	C & H Transmission	Wells Fargo	\$621.89

Count No.	Date of Offense	Name of Drawer	Name of Financial Institution	Amount of Check
10	4/01/09	C & H Transmission	Wells Fargo	\$689.45
11	3/31/09	C & H Transmission	Wells Fargo	\$300.00
12	3/31/09	C & H Transmission	Wells Fargo	\$300.00
13	3/31/09	C & H Transmission	Wells Fargo	\$300.00
14	3/31/09	C & H Transmission	Wells Fargo	\$300.00
15	3/31/09	C & H Transmission	Wells Fargo	\$882.31
16	3/31/09	C & H Transmission	Wells Fargo	\$963.49
17	3/31/09	C & H Transmission	Wells Fargo	\$812.54
18	4/01/09	C & H Transmission	Wells Fargo	\$963.69
19	4/01/09	C & H Transmission	Wells Fargo	\$963.89
20	3/31/09	Cook Construction	1 st Bank & Trust	\$400.00
21	3/31/09	Cook Construction	1 st Bank & Trust	\$400.00

Each count being a violation of Title 18, United States Code, Sections 513(a) and 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Counts Twenty-Two through Thirty-Nine
Uttering Forged and Counterfeited Securities
(Violation of 18 U.S.C. § 513(a))

Beginning on or about the dates set forth below, in the San Angelo Division of the Northern District of Texas, and elsewhere, **William Adair, Lisa Smith, Jamie King, and Clinton Johnson**, defendants, did make, possess, and utter, forged and counterfeited securities of an organization, as that term is defined in Title 18, United States Code, Section 513(c)(4), with the intent to deceive another person and organization:

Count No.	Date of Offense	Name of Drawer	Name of Financial Institution	Amount of Check
22	3/23/09	Brandy Morris	Crocket National Bank	\$99.33
23	3/23/09	Brandy Morris	Crocket National Bank	\$482.60
24	3/28/09	David Adair	Crocket National Bank	\$131.96
25	3/22/09	Brandy Morris	Citizen's State Bank	\$378.89
26	3/22/09	Brandy Morris	Citizen's State Bank	\$109.00
27	3/22/09	Brandy Morris	Citizen's State Bank	\$757.93
28	3/23/09	Brandy Morris	Citizen's State Bank	\$113.22
29	3/22/09	Brandy Morris	Citizen's State Bank	\$108.49
30	3/22/09	Brandy Morris	Citizen's State Bank	\$211.59
31	3/22/09	Brandy Morris	Citizen's State Bank	\$231.10
32	3/22/09	Brandy Morris	San Angelo National	\$110.63
33	3/29/09	Lisa Smith	San Angelo National	\$345.97
34	3/31/09	Lisa Smith	Wells Fargo	\$247.64

Count No.	Date of Offense	Name of Drawer	Name of Financial Institution	Amount of Check
35	3/31/09	Lisa Smith	Wells Fargo	\$156.17
36	3/29/09	Lisa Smith	Wells Fargo	\$479.50
37	3/30/09	Lisa Smith	Wells Fargo	\$233.80
38	3/29/09	Lisa Smith	Wells Fargo	\$327.72
39	3/29/09	Lisa Smith	Wells Fargo	\$319.62

Each count being a violation of Title 18, United States Code, Sections 513(a) and 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Forty

Identity Theft

(Violation of 18 U.S.C. §§ 1028(a)(7), (b)(2)(A), (c)(3)(A))

From beginning on or about March 1, 2009, and continuing to on or about April 30, 2009, in the San Angelo Division of the Northern District of Texas, and elsewhere, **Jamie King**, defendant, did knowingly use and possess, without lawful authority, a means of identification of another person, to wit: Brandy Morris, with the intent to commit, and to aid and abet, and in connection with, an unlawful activity that constitutes a violation of federal law, to wit: a violation of 18 U.S.C. § 513(a), such prohibited possession and use in and affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(2)(A), 1028(c)(3)(A), and 2.

Count Forty-One

Identity Theft

(Violation of 18 U.S.C. §§ 1028(a)(7), (b)(2)(A), (c)(3)(A))

From beginning on or about March 1, 2009, and continuing to on or about April 30, 2009, in the San Angelo Division of the Northern District of Texas, and elsewhere, **William Adair**, defendant, did knowingly use and possess, without lawful authority, a means of identification of another person, to wit: David Adair, with the intent to commit, and to aid and abet, and in connection with, an unlawful activity that constitutes a violation of federal law, to wit: a violation of 18 U.S.C. § 513(a), such prohibited possession and use in and affecting interstate commerce.


In violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(2)(A), 1028(c)(3)(A), and 2.

A TRUE BILL:



FOREMAN

JAMES T. JACKS
UNITED STATES ATTORNEY



ANN C. ROBERTS
Assistant United States Attorney
Texas State Bar No. 24032102
1205 Texas Avenue, Suite 700
Lubbock, Texas 79401
Tel: 806.472.7397
Fax: 806.472.7324
Email: ann.roberts@usdoj.gov

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
SAN ANGELO DIVISION

THE UNITED STATES OF AMERICA

v.

WILLIAM ADAIR (1)
LISA SMITH (2)
JAMIE KING (3)
CLINTON JOHNSON (4)

INDICTMENT

COUNT 1: CONSPIRACY TO MANUFACTURE, POSSESS, AND UTTER
COUNTERFEIT SECURITIES

Title 18, United States Code, Section 371.

COUNTS 2-39: UTTERING FORGED AND COUNTERFEITED SECURITIES

Title 18, United States Code, Section 513(a).

COUNTS 40-41: IDENTITY THEFT

Title 18, United States Code, Section 1028(a)(7),(b)(2)(A),(c)(3)(A)

(41 COUNTS)

A true bill rendered:

Lubbock

 Foreperson

Filed in open court this 12th day of AUGUST, A.D. 2009.

Clerk

Warrants to Issue


UNITED STATES DISTRICT JUDGE

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS**
Related Case Information
1. Defendant Information

 Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☐ Yes ☐ No

 Superseding: ☐ Yes ☒ No New Defendant: ☐ Yes ☐ No
 Indictment/Information ☐ Yes ☒ No If Yes, number: _____
 Search Warrant Case Number _____
 R 20 from District of _____

 Defendant Name William Adair

Alias Name _____

Address _____

County in which offense was committed: Tom Green County

2. U.S. Attorney Information

 AUSA Ann C. Roberts

 Bar # 24032102
3. Interpreter
☐ Yes ☐ No

If Yes, list language and/or dialect:

4. Location Status

Arrest Date _____

☐ Already in Federal Custody
☒ Already in State Custody - Tom Green County Jail
☐ On Pretrial Release

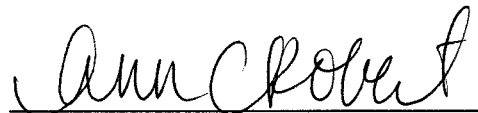
ON BOND
5. U.S.C. Citations

 Total # of Counts as to This Defendant: 40 ☐ Petty ☐ Misdemeanor ☒ Felony

<u>Citation</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
18 U.S.C. § 371 -	Conspiracy to Make, Possess, and Utter Forged Securities	1
18 U.S.C. § 513(a) -	Uttering Forged and Counterfeited Securities	2-39
18 U.S.C. §§1028(a)(7),(b)(2)(A),(c)(3)(A) -	Identity Theft	41

 Date 08/12/09

Signature of AUSA:



ANN C. ROBERTS

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS**
Related Case Information
1. Defendant Information

 Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☐ Yes ☐ No

 Superseding: ☐ Yes ☒ No New Defendant: ☐ Yes ☐ No
 Indictment/Information ☐ Yes ☒ No If Yes, number: _____
 Search Warrant Case Number _____
 R 20 from District of _____

 Defendant Name Lisa Smith

Alias Name _____

Address _____

County in which offense was committed: Tom Green County

2. U.S. Attorney Information

 AUSA Ann C. Roberts

 Bar # 24032102
3. Interpreter
☐ Yes ☐ No

If Yes, list language and/or dialect:

4. Location Status

Arrest Date _____

☐ Already in Federal Custody
☒ Already in State Custody - Tom Green County Jail
☐ On Pretrial Release

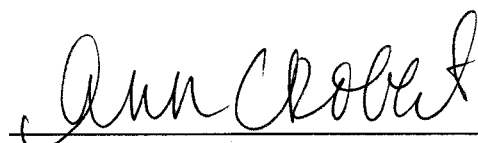
ON BOND
5. U.S.C. Citations

 Total # of Counts as to This Defendant: 40 29 ☐ Petty ☐ Misdemeanor ☒ Felony

<u>Citation</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
18 U.S.C. § 371 -	Conspiracy to Make, Possess, and Utter Forged Securities	1
18 U.S.C. § 513(a) -	Uttering Forged and Counterfeited Securities	2-39

 Date 08/12/09

Signature of AUSA:


 ANN C. ROBERTS

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS**
Related Case Information
1. Defendant Information

 Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☐ Yes ☐ No

 Superseding: ☐ Yes ☒ No New Defendant: ☐ Yes ☐ No

Indictment/Information

 Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number:

Search Warrant Case Number _____

R 20 from District of _____

 Defendant Name Jamie King

Alias Name _____

Address _____

County in which offense was committed: Tom Green County

2. U.S. Attorney Information

 AUSA Ann C. Roberts

 Bar # 24032102
3. Interpreter
☐ Yes ☐ No

If Yes, list language and/or dialect:

4. Location Status

Arrest Date _____

☐ Already in Federal Custody

☒ Already in State Custody - Tom Green County Jail

☐ On Pretrial Release

ON BOND
5. U.S.C. Citations

 Total # of Counts as to This Defendant: 40 ☐ Petty ☐ Misdemeanor ☒ Felony

<u>Citation</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
18 U.S.C. § 371 -	Conspiracy to Make, Possess, and Utter Forged Securities	1
18 U.S.C. § 513(a) -	Uttering Forged and Counterfeited Securities	2-39
18 U.S.C. §§1028(a)(7),(b)(2)(A),(c)(3)(A) -	Identity Theft	40

 Date 08/12/09

Signature of AUSA:



ANN C. ROBERTS

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS**

Related Case Information

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☐ Yes ☐ No

Superseding: ☐ Yes ☒ No New Defendant: ☐ Yes ☐ No

Indictment/Information

Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number:

Search Warrant Case Number _____

R 20 from District of _____

Defendant Name Clinton Johnson

Alias Name _____

Address _____

County in which offense was committed: Tom Green County

2. U.S. Attorney Information

AUSA Ann C. Roberts

Bar # 24032102

3. Interpreter

☐ Yes ☐ No

If Yes, list language and/or dialect:

4. Location Status

Arrest Date _____

☐ Already in Federal Custody

☒ Already in State Custody - Tom Green County Jail

☐ On Pretrial Release

ON BOND

5. U.S.C. Citations

Total # of Counts as to This Defendant: 40 39

☐ Petty

☐ Misdemeanor

☒ Felony

Citation

Description of Offense Charged

Count(s)

18 U.S.C. § 371 - Conspiracy to Make, Possess, and Utter Forged Securities

1

18 U.S.C. § 513(a) - Uttering Forged and Counterfeited Securities

2-39

Date 08/12/09

Signature of AUSA: Ann C. Roberts

ANN C. ROBERTS